

BLANK ROME LLP
Attorneys for Defendant
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
The Chrysler Building
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOPMAR S.R.L.,

Plaintiff,

- against -

BASIC COMMODITIES B.V.,

Defendant.

08 CIV 5009 (RPP)

**NOTICE OF MOTION UNDER F.R. CIV. P. RULE 12
AND RULE E OF THE SUPPLEMENTAL RULES FOR
CERTAIN ADMIRALTY AND MARITIME CLAIMS
AND LOCAL ADMIRALTY RULE E.1 FOR VACATUR
OR REDUCTION OF PLAINTIFF'S MARITIME
ATTACHMENT AND, OR IN THE ALTERNATIVE,
FOR COUNTERSECURITY**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, Defendant, will move this Court before the Hon. Robert P. Paterson, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Rule E(4)(f) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure ("F.R.Civ.P.") and/or, alternatively F.R.Civ.P. Rule 12 vacating the attachment order

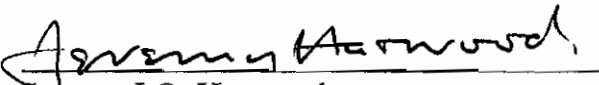
obtained by Plaintiff pursuant to Supplemental Rule B and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE THAT, under Local Rule 6.1(c) of the United States District Courts for the Southern and Eastern Districts of New York and the Court's individual practice rules, oral argument will be heard if so directed by the Court or upon application and that oral argument is so requested.

Date: New York, New York
July 24, 2008

Respectfully submitted,

BLANK ROME LLP

By: 
Jeremy J.O. Harwood
405 Lexington Avenue
New York, New York 10174
(212) 885-5000

Attorneys for Defendant